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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 LETICIA RODRIGUEZ,

17 Plaintiff,

18 vs.

19 NATIONAL CONSUMER TELECOM &
20 UTILITIES EXCHANGE, INC., COX
21 COMMUNICATIONS,

22 Defendants.

23 Case No. 2:21-CV-01407-JCM-BNW

24 **STIPULATION AND [PROPOSED]
25 ORDER EXTENDING TIME FOR COX
26 COMMUNICATIONS TO RESPOND TO
27 PLAINTIFF'S COMPLAINT FOR
28 DAMAGES PURSUANT TO THE FAIR
CREDIT REPORTING ACT, 15 U.S.C. §
1681 ET SEQ.**

(FOURTH REQUEST)

20 Defendant Cox Communications (“Cox”), by and through its attorneys, Dickinson Wright
21 PLLC, and Plaintiff Leticia Rodriguez (“Plaintiff”), by and through her attorneys, Krieger Law
22 Group, LLC, stipulate and agree as follows:

23 1. Plaintiff filed her Complaint for Damages Pursuant to the Fair Credit Reporting
24 Act, 15 U.S.C. § 1681, et seq. (First Request), on July 28, 2021 (the “Complaint”).

25 2. Plaintiff served Cox on July 30, 2021.

26 3. Pursuant to the Stipulation and Order approved by the Court on August 20, 2021,
27 Cox’s deadline to respond, move or otherwise plead to the Complaint was extended to September

1 20, 2021.

2 4. Pursuant to the Stipulation and Order approved by the Court on September 15,
3 2021, Cox's deadline to respond, move or otherwise plead to the Complaint was extended to
4 October 8, 2021.

5 5. Pursuant to the Stipulation and Order approved by the Court on October 7, 2021,
6 Cox's deadline to respond, move or otherwise plead to the Complaint was extended to October 29,
7 2021.

8 6. Plaintiff and Defendant have agreed that Cox shall have an additional extension up
9 to and including November 8, 2021, to respond, move or otherwise plead to the Complaint to
10 provide Cox with additional time to continue its investigation and review its records pertaining to
11 the allegations in the Complaint.

12 7. This is the fourth stipulation between Plaintiff and Cox to extend the time for Cox
13 to respond, move or otherwise plead to the Complaint and it is not being entered into for purposes
14 of any delay.

15 Dated: October 27th 2021.

Dated: October 27th 2021.

16 **DICKINSON WRIGHT PLLC**

17 /s/: Michael N. Feder

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Attorneys for Plaintiff Leticia Rodriguez

25 * * *

26 **ORDER**

27 **IT IS SO ORDERED.**

28 DATED: _____ October 28 _____, 2021


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 27th day of October, 2021, a copy of **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR COX COMMUNICATIONS TO RESPOND TO PLAINTIFF'S COMPLAINT FOR DAMAGES PURSUANT TO THE FAIR CREDIT REPORTING ACT, 15 U.S.C. § 1681 ET SEQ., (FOURTH REQUEST)** was served electronically to all parties of interest through the Court's *CM/ECF system* as follows:

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